

CHRISTENSEN JAMES & MARTIN  
7440 WEST SAHARA AVE., LAS VEGAS, NEVADA 89117  
PH: (702) 255-1718 § FAX: (702) 255-0871

1 **CHRISTENSEN JAMES & MARTIN**  
2 KEVIN B. CHRISTENSEN, ESQ. (175)  
3 Email: [kbc@cjmlv.com](mailto:kbc@cjmlv.com)  
4 DARYL E. MARTIN, ESQ. (6375)  
5 Email: [dem@cjmlv.com](mailto:dem@cjmlv.com)  
6 7440 W. Sahara Avenue  
7 Las Vegas, Nevada 89117  
8 Tel.: (702) 255-1718  
9 Fax: (702) 255-0871  
10 *Attorneys for UNITE HERE HEALTH*

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 \* \* \* \* \*

14 ERIC PALACIOS & ASSOCIATES, LTD.

15 Plaintiff,

16 vs.

17 FIDELIA ORTIZ-DEMORAN, an individual;  
18 UNIVERSITY MEDICAL CENTER dba UMC  
19 HOSPITAL; UNITE HERE HEALTH, an unknown  
20 entity; LAS VEGAS FIRE & RESCUE; DESERT  
21 RADIOLOGY SOLUTIONS, LLC; AGATE/VENGER  
22 PARTNERSHIP, LLP dba WESTERN REGIONAL  
23 CENTER FOR BRAIN AND SPINE SURGERY; DOES I  
24 through X, and ROE CORPORATIONS I through X,  
25 inclusive,

26 Defendants.

Case: 2:15-cv-00778-RFB-CWH

**UNITE HERE HEALTH'S  
STATEMENT REGARDING  
REMOVED ACTION**

27 Consistent with local practice, Defendant UNITE HERE HEALTH ("UHH") respectfully  
28 submits this Statement Regarding Removed Action:

- 29 1. **The date(s) on which you were served with a copy of the Complaint in the removed**  
30 **action:** A copy of the Amended Complaint in Interpleader was first received by UHH  
31 representatives on April 14, 2015.
- 32 2. **The date(s) on which you were served with a copy of the Summons:** April 14, 2015.
- 33 3. **In removals based on diversity jurisdiction, the names of any served defendants who**  
34 **are citizens of Nevada, the citizenship of the other parties and a summary of**

1 **defendant's evidence of the amount in controversy:** The removal of this case was not  
2 based on diversity jurisdiction.

- 3 4. **If your Notice of Removal was filed more than thirty (30) days after you first**  
4 **received a copy of the Summons and Complaint, the reason removal has taken place**  
5 **at this time and the date you first received a paper identifying the basis for removal:**

6 The Notice of Removal was filed within thirty (30) days after UHH first received a copy  
7 of the Summons and Complaint.

- 8 5. **In actions removed on the basis of the court's jurisdiction in which the action in**  
9 **state court was commenced more than one year before the date of removal, the**  
10 **reasons this action should not summarily be remanded to the state court:** This  
11 action was commenced in state court less than one year before the date of removal.

- 12 6. **The name(s) of any defendant(s) known to have been served before you filed the**  
13 **Notice of Removal who did not formally join in the Notice of Removal and the**  
14 **reasons they did not:** UHH presently has no information indicating whether any other  
15 Defendant was served before the Notice of Removal was filed in this Court.

16 Dated this April 28, 2015.

17 CHRISTENSEN JAMES & MARTIN

18 By: /s/ Daryl E. Martin  
19 Daryl E. Martin, Esq.  
20 Nevada Bar No. 006735  
21 7440 W. Sahara Ave.  
22 Las Vegas, Nevada 89117  
23 *Attorneys for UNITE HERE HEALTH*  
24  
25  
26  
27  
28

I am over the age of 18, I am employed by and am readily familiar with the practices of Christensen James & Martin (“Firm”). On the date of filing of the foregoing papers with the Clerk of Court the Firm caused a true and correct file-stamped copy of the STATEMENT REGARDING REMOVED ACTION to be served in the following manner:

☐ UNITED STATES MAIL: By depositing a true and correct copy of the above-referenced document into the United States Mail with prepaid first-class postage, addressed to counsel for the Plaintiff:

☐ OVERNIGHT COURIER: By depositing a true and correct copy of the above-referenced document for overnight deliver via a nationally-recognized courier, addressed to the parties listed on the attached service list at their last-known mailing address.

☐ FACSIMILE: By sending the above-referenced document via facsimile to those persons listed on the attached service list and with the set forth facsimile numbers.

By: /s/ Natalie Saville